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US ARMY PUBLIC HEALTH CENTER  
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Directorate of Clinical Public Health & Epidemiology  
Occupational Medicine Division

Position Paper

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**SUBJECT:** Use of Opioid Medications for Employees in Critical Safety or Security Positions and Positions with Safety Sensitive Duties.

**1. REFERENCES.**

- A. Army Regulation 40-5, Preventive Medicine, 25 May 2007.
- B. Army Regulation 600-85, The Army Substance Abuse Program, 28 December 2012.
- C. Army Regulation 50-6, Chemical Surety, 28 July 2008.
- D. American College of Occupational and Environmental Medicine (ACOEM) Practice Guidelines, *Opioids Guideline*, 2014.
- E. US Army Aeromedical Policy Letters, Medication Waivers, January 2002 Revision.

**2. BACKGROUND.** Employees who work in safety-sensitive occupations or handle sensitive items must conduct operations in a safe, secure and reliable manner. A safety-sensitive position or function means any job position or work-related function or job task designated as such by the employer, which through the nature of the activity could be dangerous (unsafe, hazardous, can cause harm) to the physical well-being of or jeopardize the security of the employee, co-workers, customers or the general public through a lapse in attention or judgment. Some examples of safety-sensitive duties include driving vehicles, using heavy equipment, working around explosives or weaponry; performing patient care activities; performing essential job duties at heights; performing essential job duty tasks which require high levels of cognitive function and judgment; and performing personnel reliability program duties. Any medical issue that can potentially impair the way these workers function while on the job must be thoroughly evaluated by a competent healthcare provider and fitness for duty must be determined. Treatment with opioid medication, or other CNS depressants such as benzodiazepines, and the condition for treatment are medical issues that can cause potential impairment.

**3. POSITION.** The following outlines the position of the Army Public Health Center based on the clinical practice guidelines within reference D:

- A. Army employees in safety sensitive positions who are being treated with opioids or benzodiazepine medications must be evaluated by a competent medical authority.

- B. If the Army employee requires the use of opioid pain medication, they must not perform safety sensitive duties.
- C. The employee is considered unfit for safety sensitive duties until such a time when he or she is no longer taking opioid pain medication and the medical condition for which they were taking these medications is clinically stable with functional recovery to allow the performance of job functions with or without accommodation.
- D. Prior to recommending an employee's return to a safety sensitive position, the healthcare provider must ensure that sufficient time has passed after the last dose of an opioid so that approximately 90 percent of the drug and its active metabolites are eliminated from the body. This time period is approximately 3.3 half-lives of the medication.

**4. POINT OF CONTACT.** Dr. Raúl Mirza, Chief, Occupational Medicine Division at (410) 436-5289 or [raul.a.mirza.mil@mail.mil](mailto:raul.a.mirza.mil@mail.mil) and Dr. Pearline McKenzie-Garner at (410) 436-3687 or [pearline.p.mckenziegarner.civ@mail.mil](mailto:pearline.p.mckenziegarner.civ@mail.mil).